

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LVI INTERMEDIATE HOLDINGS, INC., *et
al.*¹

Debtors.

Chapter 11

Case No. 20-11413-KBO

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appear in the above-captioned case for and on behalf of Tamara Williams, class action plaintiff in that certain action pending before the Chancery Court of Tennessee for the Thirtieth Judicial District and Memphis, Case No. CH-20-0510, and all persons similarly situated (collectively, the “Class Members”), for all purposes in connection with this case. The undersigned counsel hereby request service of any and all notices given or required to be given in the above-captioned case, and all papers served or required to be served in the case, and request that the names and addresses of the undersigned counsel be added to all mailing matrices in this case. Service may be made and directed as follows:

¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: LVI Intermediate Holdings, Inc., (7674); Total Vision Institute, LLC (7571); QualSight, LLC (3866); The LASIK Vision Institute, LLC (7564); Cataract Vision Institute, LLC (7697); Healthcare Marketing Services, LLC (9982); Cataract Vision Institute Florida, LLC (3423); TLC Vision Center Holdings, LLC (5400); TLC Whitten Laser Eye Associates, LLC (0182); TLC Vision Centers, LLC (8271); TruVision, LLC (3399); TruVision Contacts, LLC (3399); Laser Eye Surgery, LLC (3448); TLC Laser Eye Centers (Refractive I), LLC (2702); TLC The Laser Center (Pittsburgh) L.L.C. (2881); TLC The Laser Center (Indiana) LLC (8456); TLC The Laser Center (Institute), LLC (0959); and LVI Missouri, LLC (7088). The Debtors’ executive headquarters are located at 1555 Palm Beach Lakes Blvd., Suite 600, West Palm Beach, Florida 33401.

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, email, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein, and for the purposes of CM/ECF.

This Notice of Appearance and Request for Service of Papers is without prejudice to the Class Members' rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the court, and shall not be deemed or construed to submit the Class Members to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation the Class Members' (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which the Class Members are or may be

entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Class Members expressly reserve.

Dated: July 6, 2020
Wilmington, Delaware

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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*Counsel to Tamara Williams, class action plaintiff
in that certain action pending before the Chancery
Court of Tennessee for the Thirtieth Judicial
District and Memphis, Case No. CH-20-0510, and
all persons similarly situated*